

October 3, 2022

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BY CM/ECF & HAND DELIVERY

The Honorable Lewis A. Kaplan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Telecom Business Solution, LLC, et al., v. Terra Towers Corp., et al.,***
Civil Action No.: 1:22-cv-07301

Your Honor:

We represent Respondents Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”), and AMLQ Holdings (Cay), Ltd. (“AMLQ,” together with Peppertree, “Peppertree/AMLQ”) in the above-captioned action (“Action”). Peppertree/AMLQ’s response to Petitioners Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc.’s (collectively “Terra/DTH”) Amended Petition in this Action is currently due on October 5, 2022. We respectfully request a one-week extension, to October 12, 2022, to respond to the Amended Petition because the current deadline is on Yom Kippur, and several members of Peppertree/AMLQ’s legal teams, including lead counsel, observe the holiday. ***We have conferred with counsel for Terra/DTH, and they have agreed to this extension.***

This is Peppertree/AMLQ’s second request for extension in this Action and is not interposed for delay. Peppertree/AMLQ only sought the initial extension because Terra/DTH represented that they intended to amend their Petition. Additionally, no party will be prejudiced by the requested extension as the Amended Petition was only filed on September 6, 2022, and this is an agreed-to request. Accordingly, we respectfully request that this Court extend the deadline by which Peppertree/AMLQ are required to respond to the Amended Petition up to and including October 12, 2022.

Thank you for your consideration.

Respectfully submitted,

/s/ Gregg L. Weiner
Gregg L. Weiner

Counsel for AMLQ Holdings (Cay), Ltd.

/s/ Michael N. Ungar
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*Counsel for Telecom Business Solution, LLC
and LATAM Towers, LLC*

CC: All Counsel of Record